AO Quick Reference Guide for

Trade Association PACs, Part 1

(All AOs can be located on the FEC's website at http://saos.fec.gov/saos/searchao.)

Elements of a Solicitation

AO 1979-13 Raymond International Inc. Employees' PAC

When a Communication is Not a Solicitation

AO 1991-03	TEX/CON Oil and Gas Company and TEX/CON Oil and Gas Company PAC
AO 1983-38	DuPont Good Government Fund
AO 1982-65	Union Carbide Corporation and Union Carbide Corporation PAC

Definition of Member (for Labor/Trade/Membership PACs)

AO 2008-21	CME Group, Inc.
AO 2003-13	American Academy of Ophthalmology PAC

Restricted Class of a Trade Association's PAC

AO 2013-06	<u>DSCC</u>
AO 2012-02	Wawa, Inc.
AO 2011-25	Atlas Air
AO 2010-04	<u>Wawa</u>
AO 2004-32	Spirit Airlines, Inc.
AO 1999-20	Equitable Companies, Inc. PAC
AO 1993-16	Blue Cross of California
AO 1980-102	Fru-Con Corporation PAC

Board of Directors

AO 2010-12	Proctor & Gamble Company and Proctor & Gamble Company Good Government
	Committee
AO 2000-10	America's Community Bankers Community Campaign Committee
AO 1985-35	Weirton
AO 1977-18	Proprietary Industry PAC

Prior Approval by Corporate Members of Trade Association

AO 2000-22	Air Transport Association of American, American Land Title Association,
	Council of Insurance Agents and Brokers, Independent Insurance Agents of
	America, Society of Independent Gasoline Marketers of America
AO 2000-10	America's Community Bankers Community Campaign Committee
AO 1984-61	Society of American Florists

Voluntary Contributions and Solicitation Notices

AO 2006-17 Berkeley Electric Cooperative, Inc.

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AO 2003-06	Public Service Enterprise Group, Inc.
AO 1997-25	Hughes Electronics Corporation

Corporations Acting as Members of Trade Associations

AO 2003-22 <u>American Bankers Association</u>

Payroll Deduction

AO 2000-11	Georgia-Pacific Corporation
AO 1999-33	MediaOne PAC

No Reverse Checkoff

AO 2001-04 Morgan Stanley Dean Witter & Co. PAC (fn. 4)

Electronic Authorizations

AO 2001-04	Morgan Stanley Dean Witter & Co. PAC
AO 1999-03	Microsoft Corporate PAC
AO 1997-09	Chicago Board of Trade

Telephone Recorded Conversations

AO 2013-12 Service Employees International Union (SEIU) and SEIU Committee on Political Education

Corporations Owned by Members of Trade Associations

AO 2012-15 American Physical Therapy Association

Scenario #1: Payroll Deduction and Fundraising Events by Trade Association

AO 2003-05	National Association of Home Builders
AO 1981-40	Bache Halsey Stuart Shields Incorporated
AO 1981-33	Astoria Federal Savings and Loan Association
AO 1980-50	United Merchants and Manufactures, Inc. Manufacturing Division Committee for
	Responsible Government

Promotional Items and One-Third Rule

AO 2003-33	Anheuser-Busch Companies, Inc.
AO 1999-31	Oshkosh Truck Corporation and Oshkosh Truck Corporation Employees' PAC
AO 1995-17	National Association of Realtors PAC
AO 1980-50	United Merchants and Manufacturers, Inc. Manufacturing Division Committee
	for Responsible Government

Member-Provided Assistance

AO 1995-17 National Association of Realtors PAC

AO 1989-18 Association of Independent Colleges and Schools PAC

Ongoing Events

AO 1999-31 Oshkosh Truck Corporation and Oshkosh Truck Corporation Employees' PAC

Elements of a Solicitation

AO 1979-66	Associated General Contractors PAC
AO 1979-13	Raymond International Inc. Employees' PAC

When a Communication is **Not** a Solicitation

AO 1991-03	TEX/CON Oil and Gas Company and TEX/CON Oil and Gas Company PAC
AO 1983-38	DuPont Good Government Fund
AO 1982-65	Union Carbide Corporation and Union Carbide Corporation PAC

Web Pages

AO 2006-03	Whirlpool Corporation PAC
AO 2000-07	Alcatel USA, Inc.

Contributor Screening and Vetting

AO 2011-13 <u>Democratic Senatorial Campaign Committee</u>

Collecting Online Contributions via Credit Cards/Electronic Checks/Online Banking Services

AO 2007-17	Democratic Senatorial Campaign Committee
AO 1999-36	Campaign Advantage
AO 1999-09	Bill Bradley for President, Inc.
AO 1999-03	Microsoft Corporate PAC
AO 1995-09	NewtWatch PAC

Email Solicitations

AO 2000-07	Alcatel USA, Inc.
AO 1995-33	Coastal Employee Action Fund

Solicitations via Text Message

<u>Inc.</u>

Scenario #2: Email Newsletter Articles

AO 2006-17	Berkeley Electric Cooperative, Inc.
AO 2003-06	Public Service Enterprise Group, Inc.
AO 1997-25	Hughes Electronic Corporation